

**IN THE  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>Cause No. 4:21-cr-40048-SMY</b>
<b>vs</b>	)	
	)	
<b>CARLOS L. HALLIBURTON</b>	)	
	)	
<b>Defendant.</b>	)	

**DEFENDANT’S MOTION FOR FURLOUGH**

COMES NOW Defendant Carlos Halliburton, by and through counsel, and hereby requests that the Court grant him a brief furlough to attend the birth of his child. In support, counsel states as follows:

1. Mr. Halliburton and his wife, Mrs. Jordan Halliburton have both contacted undersigned counsel about the impending birth of their child.
2. Mrs. Halliburton is scheduled for labor induction of their child at St. Francois Medical Center Labor and Delivery on July 21, 2023 at 4:00 a.m.
3. Mr. Halliburton is confined in the Saline County Detention Center pending sentencing.
4. Mr. Halliburton respectfully requests that this Court allow him to attend the birth of his child at St. Francois Medical Center Labor and Delivery, 211 St. Francis Drive, Cape Girardeau, Missouri 63703.
5. Mr. Halliburton respectfully requests that the Court allow him to remain at the hospital for the length of Mrs. Halliburton’s labor and for at least two hours after the baby’s birth.

6. Defense counsel has reviewed MyChart medical records that verify the induction appointment date, time, and location.

7. Mr. Halliburton does not make this request to burden or annoy the Court, but instead does so that he can support his wife during the labor and delivery of their child. Mr. Halliburton is facing a mandatory minimum of 15 years in prison. He was aware of that during his pretrial release. He complied with every condition of pretrial release until he was taken into custody at his plea. There is no reason to believe that Mr. Halliburton would not comply with any condition this Court would impose as a condition of any furlough.

8. Undersigned counsel has discussed this motion with the government. The government is opposed to the granting of a furlough.

WHEREFORE, Defendant respectfully requests that the Court grant him a furlough to support his wife in her labor and delivery and to be present for the birth of their child.

Respectfully submitted,

MUHLENKAMP & BERNSEN,  
ATTORNEYS AT LAW, LLC

By: /s/ Tory D. Bernsen  
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**CERTIFICATE OF SERVICE**

I hereby certify that on July 17, 2023, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all parties of record.

/s/ Tory D. Bernsen